

Michelle Hasson

18-2-5

18-2-6

March 21, 2018

Chair Nichols and Members of the Board
California Air Resources Board ("CARB")
1001 "I" Street
Sacramento, CA 95814

**Re: Agenda Item Nos. 18-2-1, 18-2-5, and 18-2-6 – Freight Pollution And
Its Harms to Our Communities**

Dear Chair Nichols and Members of the Board:

On behalf of the undersigned organizations, we write regarding clean air in our communities. We are organizations with members living and breathing some of the most polluted air in the nation. We write this today as the freight industry pushes its desires for economic expansion to the detriment of our health. We are directly impacted by the warehouses that seemingly pop up near our schools and homes overnight. We are also impacted by the immense pollution load coming from the freight industrial complex in Los Angeles County that causes a dense smog to cover our communities in the summer and deadly particulate pollution to be pervasive in our communities in the winter. We need CARB to take these matters seriously and work with us to provide clean air and an actual strategy to clean up these deadly freight facilities.

I. We Cannot Rely On Local Agencies To Address Freight Facilities.

Our local air district, the South Coast Air Quality Management District (SCAQMD) is showing lack of leadership in addressing our region's growing pollution sources. The SCAQMD board refuses to hold polluters accountable for the air quality burdens produced by our region's growing logistics distribution centers. The SCAQMD is likely going to vote against an Indirect Source Rule that would reduce emissions from the logistics distributions centers. The Board is doing this in spite of requirements in California law that they include Indirect Source Control in its air plan.

To make matters worse, the SCAQMD Staff recommended that the agency pursue a mandatory indirect source rule on warehouses. But, at the March 2 SCAQMD board meeting, it has become clear that the freight industry has convinced many Board members that voluntary programs where tax payers pay to clean up deadly freight operations is the preferred approach, as opposed to actual mandatory programs. With more than 1.2 billion sq. ft. of warehouses, distribution centers, cold storage facilities and truck terminals in the region, controlling pollution from existing and future

warehouse development is vital to attaining state and federal clean air standards, in addition to protecting communities from warehouse pollution.

CARB should not continue to approve the SCAQMD air plans until staff recommendations are integrated into the plan and the rule making process for Indirect Source Rules on warehouses are implemented at SCAQMD.

II. ARB Must Move Forward on Freight Regulations

We are pleased to see additional regulations proposed such as a zero emissions drayage truck rule. But, we want to see these regulations adopted more quickly. We cannot wait until 2022 for the agency to complete this regulation. We also remain concerned about the phased-in approach to rulemaking that could delay many necessary regulatory actions way out into the future.

It is our understanding that this phased in approach is a result of limited staffing. CARB staffing priorities should reflect the urgency of the air quality crisis plaguing environmental justice communities impacted by Goods Movement. While we understand that regulations cannot be crafted overnight, the freight pollution requires the CARB to allocate significant staff to protecting communities specifically in rulemaking and enforcement. To the extent a lack of staffing is an issue, we highly recommend allocating more staff to make sure the agency can fulfill its existing promises to reduce emissions in impacted communities.

III. Support Enhanced Enforcement, Freight Handbook Work, and Other Measures Aimed at Reducing Impacts from Freight.

There is an utter lack of leadership on the local level to tackle pollution from sources like warehouses, which are proliferating throughout the State with no base level of requirements that must be implemented. As such, we support these types of efforts to fill in the gaps where local entities are failing.

IV. A Plan That Is Based on Tax Payer Incentives for Natural Gas Vehicles Is No Plan At All.

Before the CARB Board today is approval of a program to target natural gas engines in disadvantaged communities, including a focus on natural gas trash trucks and drayage trucks. No thank you. We have seen the peril that natural gas engines and their fueling stations impose on our communities. And, we are concerned that our agencies are not getting the message that we want zero emissions, not natural gas

engines. Provide these natural gas trucks and fueling stations to Beverly Hills and Bel Air, not our communities.

We appreciate your consideration of these comments.

Sincerely,

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Center for Community Action and Environmental Justice CCAEJ

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